

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

STATE OF OKLAHOMA, ex rel., <i>et al.</i> ,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	
	)	
TYSON FOODS, INC., <i>et al.</i> ,	)	
	)	
Defendants.	)	05-CV-0329 JOE-SAJ
	)	
TYSON FOODS, INC., <i>et al.</i> ,	)	
	)	
Third Party Plaintiffs,	)	
	)	
vs.	)	
	)	
City of Tahlequah, <i>et al.</i> ,	)	
	)	
Third Party Defendants.	)	

**DEFENDANT/THIRD PARTY PLAINTIFF PETERSON FARMS, INC.’S  
MOTION TO WITHDRAW MARTIN BROWN AS COUNSEL OF RECORD**

Defendant/Third Party Plaintiff, Peterson Farms, Inc. (“Peterson”), by and through its counsel of record A. Scott McDaniel, Chris A. Paul, Nicole M. Longwell, Philip Hixon and Martin Brown of the firm Joyce, Paul & McDaniel, PLLC, respectfully requests that this Court enter an Order withdrawing Martin Brown as its counsel of record. In support of its Motion, Peterson hereby states:

1. Martin Brown, who has entered an appearance as counsel of record for Peterson, is no longer employed by Joyce, Paul & McDaniel, PLLC. A. Scott McDaniel, Chris A. Paul, Nicole M. Longwell and Philip Hixon of Joyce, Paul & McDaniel, PLLC, will remain counsel for Peterson and have previously entered their appearances as Peterson’s counsel with the Court.

2. Peterson is aware of this Motion, and it has no objection to Martin Brown withdrawing as its counsel.

3. Accordingly, Peterson hereby requests that Martin Brown be allowed to withdraw as counsel of record for it.

WHEREFORE, Peterson respectfully requests that the Court enter an order allowing and recognizing the withdrawal of Martin Brown as counsel of record for it, and relieving Martin Brown of any further obligation to represent Peterson in this action.

Respectfully submitted,

By s/ Nicole M. Longwell

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## **CERTIFICATE OF SERVICE**

I certify that on the 1st day of February, 2006, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

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I also hereby certify that I served the attached documents by United States Postal Service, proper postage paid, on the following who are not registered participants of the ECF System:

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.s/Nicole M. Longwell